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6 Attorneys for Defendant  
SALVADOR ORTIZ-PADILLA  
7

8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 SALVADOR ORTIZ-PADILLA,

15 Defendant.  
16

Case No. 1:21-cr-00239-JLT-SKO

STIPULATION TO CONTINUE CHANGE OF  
PLEA HEARING; ORDER

17 IT IS HEREBY STIPULATED, by and between the parties through their respective  
18 counsel, Assistant United States Attorney Justin Gilio, counsel for plaintiff, and Assistant  
19 Federal Defender Reed Grantham, counsel for Salvador Ortiz-Padilla, that the change of plea  
20 hearing currently scheduled for June 17, 2024, may be continued to July 8, 2024, at 9:00 a.m.

21 The parties have been in active plea negotiations regarding a resolution in this case, and  
22 the government has extended a plea agreement in this matter. Counsel for Mr. Ortiz-Padilla had  
23 previously discussed this plea agreement in detail with Mr. Ortiz-Padilla. However, following  
24 these discussions, Mr. Ortiz-Padilla required the assistance of an immigration attorney to more  
25 fully understand the impact of any plea in this case. Mr. Ortiz-Padilla has now received answers  
26 with respect to his immigration-related questions.

27 It is anticipated that the parties will be able to resolve this matter and counsel for Mr.  
28 Ortiz-Padilla is in the process of re-explaining the terms of the plea proposal in this matter to Mr.

1 Ortiz-Padilla and is working to finalize the necessary plea documents, which include the  
2 proposed plea agreement as well as a waiver of indictment form and a superseding information.  
3 In order to accomplish this, the parties are requesting that this matter be continued to July 8,  
4 2024. This continuance is intended to factor in the time necessary for counsel for Mr. Ortiz-  
5 Padilla to finalize the plea documents and countenances undersigned counsel's scheduled leave  
6 between June 28, 2024, and July 5, 2024.

7 The requested continuance is made with the intention of conserving time and resources  
8 for both the parties and the Court. The government is in agreement with this request and the  
9 requested date is a mutually agreeable date for both parties. The parties stipulate that for the  
10 purpose of computing time under the Speedy Trial Act, the Court should exclude time from the  
11 date of this order through July 8, 2024, for defense preparation and investigation, pursuant to 18  
12 U.S.C. § 3161(h)(7)(A) and (B)(iv). The parties agree that the ends of justice served by resetting  
13 the change of plea hearing outweigh the best interest of the public and the defendant in a speedy  
14 trial.

15  
16 Respectfully submitted,

17 HEATHER E. WILLIAMS  
18 Federal Defender

19 Date: June 12, 2024

/s/ Reed Grantham  
20 REED GRANTHAM  
21 Assistant Federal Defender  
22 Attorney for Defendant  
23 SALVADOR ORTIZ-PADILLA

24 PHILLIP A. TALBERT  
25 United States Attorney

26 Date: June 12, 2024

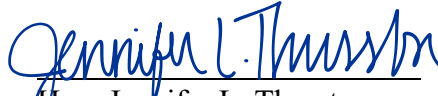
/s/ Justin Gilio  
27 JUSTIN GILIO  
28 Assistant United States Attorney  
Attorney for Plaintiff

**ORDER**

**IT IS SO ORDERED.** The change of plea hearing currently set for June 17, 2024, is hereby continued to July 8, 2024, at 9:00 a.m.

The time through July 8, 2024, is excluded under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(i) and (iv), as the ends of justice served by granting the continuance outweigh the best interest of the public and the defendant in a speedy trial.

Date: June 13, 2024

  
Hon. Jennifer L. Thurston  
United States District Judge